

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
2006 Quadrennial Regulatory Review –)	MB Docket No. 06-121
Review of the Commission’s Broadcast)	
Ownership Rules and Other Rules Adopted)	
Pursuant to Section 202 of the)	
Telecommunications Act of 1996)	
)	MB Docket No. 02-277
2002 Biennial Regulatory Review – Review)	
of the Commission’s Broadcast Ownership)	
Rules and Other Rules Adopted Pursuant)	
to Section 202 of the Telecommunications)	
Act of 1996)	MM Docket No. 01-235
)	
Cross-Ownership of Broadcast Stations and)	
Newspapers)	MM Docket No. 01-317
)	
Rules and Policies Concerning Multiple)	
Ownership of Radio Broadcast Stations in)	
Local Markets)	MM Docket No. 00-244

Definition of Radio Markets

To the Commission:

Comments of Nickolaus E. Leggett, N3NL Amateur Radio Operator

The Commission’s April 23, 2007 notice for the public meeting on media ownership to be held in Tampa, FL states that “The public may also file comments or other documents with the Commission and should reference docket number 06-121 when filing by paper or submit your filing electronically...”. Using this authority to submit comments after the formal closure of the comment period, I am filing the following additional comments in these dockets.

Nickolaus E. Leggett is a certified electronics technician and an Extra

Class amateur radio operator (call sign N3NL). He holds a Master of Arts degree in Political Science from the Johns Hopkins University and a B.A. in Government from Wesleyan University. He is also an inventor with three U.S. Patents. Mr. Leggett's latest patent is a wireless bus for digital devices and computers (U.S. Patent # 6,771,935).

Formal Goal for Local Channels

The Commission should establish a formal numerical goal for the number of new local broadcast channels in each metropolitan area. Each metropolitan area should have at least one thousand (1,000) channels that are available for the broadcasting of local and neighborhood information and locally originated programming.

These new broadcast channels should be restricted to local organizations and individuals. Outside ownership and programming would be prohibited. A limit of one channel for each individual or organization would be imposed. Profit-making and non-profit operations would be allowed.

Technical Basis for the New Channels

There is not enough room in the existing broadcast bands to provide these proposed new local broadcast channels. However, there is plenty of room in the millimeter wavelengths to easily accommodate these new channels.

Each broadcasting station could use a "lighthouse protocol" where a

rotating narrow beam is used to distribute digital program content to the memories of consumers' receivers. Each receiver would play back the program content to its user.

The station would use a protocol where the same set of packets would be repeated for each beam width around the points of the compass. For example, if the transmitter has a 10-degree beam width, it would transmit 36 repetitions of the packet set. Each repetition would be at a different compass direction to cover a full 360 degrees.

The radio receivers would put the packets together and play them out to the listeners. This would result in the program material being delayed somewhat from real time, but this would not be a major problem for most neighborhood broadcasting applications.

The Benefit of Limited Range

Another interesting facet of many bands within the millimeter waves is that there is significant atmospheric absorption of the signals. This is a major problem for many potential users, but it is actually useful for neighborhood broadcasting. This absorption would prevent a neighborhood broadcaster operating in one town from interfering with a nearby neighborhood broadcaster in another town. Each broadcaster would be limited to a naturally enforced coverage area.

My Personal Goal

My personal goal is to establish a millimeter wave local broadcasting station in the Northern Virginia area of the United States. This station would use millimeter wave transmission technology adapted and developed with the cooperation of amateur radio operators and university engineering departments. Development of suitable receivers that would buffer (store) the incoming digital program material would also be carried out.

Much of this local operation would be experimental in nature, but it would lead to a viable local broadcast technology that would provide a business opportunity for me and other participants in the project. This project would also lead to the creation of new inventions and patents that would generate value for the inventors themselves as well as advancing the state-of-the-art for broadcasting technology.

Requested Actions

The Commission should establish a rulemaking docket for the allocation of specific millimeter wave frequencies for local broadcasting purposes. The nation needs to move ahead with this technology in order to provide a much broader opportunity for democratic expression and for citizen participation in broadcasting.

In addition, The Commission should seriously consider making the media ownership rules stricter than they currently are. Each media corporation (large or small) should only be allowed one channel (radio or

television) in any metropolitan area. Provision must be made so that individuals and small neighborhood organizations can set up local broadcasting stations in their neighborhoods. These local broadcasting stations would also be subject to the one channel per owner rule.

Respectfully submitted,

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April 26, 2007